

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Daniel E. Hall

Plaintiff,

v.

Twitter, Inc.

Defendant.

Civil Action No.: 1:20-cv-00536-SE

MOTION FOR SUBSTITUTION OF COUNSEL

Now comes the defendant X Corp., as successor in interest to named defendant Twitter, Inc. (“Twitter”), by and through undersigned counsel, and hereby moves this Honorable Court to substitute its counsel of record, stating as follows:

1. Twitter is currently represented by Perkins Coie LLP and Orr & Reno P.A. (collectively, “Outgoing Counsel”) in the above captioned matter.
2. Outgoing Counsel filed a motion to dismiss, which remains pending. *See* ECF Nos. 3, 99, 124.
3. Twitter has requested that Willenken LLP and Drummond Woodsum (collectively, “Incoming Counsel”) represent it in the above-captioned matter, including with respect to the pending motion to dismiss.
4. Demetrio Aspiras, of Drummond Woodsum, filed an appearance on April 12, 2023.
5. On May 4, 2023 Attorney Aspiras also filed a motion to admit Kenneth

M. Trujillo-Jamison, of Willenken LLP, *pro hac vice* pursuant to Local Rule 83.2(b).

6. Under Local Rule 83.6(d), Outgoing Counsel require leave of Court to withdraw.

7. Under Local Rule 7.1(c), Outgoing Counsel and Incoming Counsel certify that a good faith attempt has been made to obtain Plaintiff's concurrence in the relief sought by this motion, but Plaintiff does not concur.

WHEREFORE Twitter respectfully requests this Honorable Court:

- A) APPROVE the substitution of Willenken LLP, subject to the pending *pro hac vice* motion, and Drummond Woodsum for Perkins Coie LLP and Orr & Reno P.A. as counsel for Twitter in this matter; and
- B) GRANT Perkins Coie LLP and Orr & Reno P.A. leave to withdraw pursuant to Local Rule 83.6(d); and
- C) For such further relief this Court deems appropriate.

Respectfully Submitted,

Dated: May 4, 2023

Incoming Counsel for Twitter

DRUMMOND WOODSUM

/s/ Demetrio F. Aspiras

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Dated: May 4, 2023

Outgoing Counsel for Twitter

ORR & RENO, P.A.

/s/ Jonathan M. Eck

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Dated: May 4, 2023

WILLENKEN LLP

/s/ Kenneth M. Trujillo-Jamison

Kenneth M. Trujillo-Jamison

(PHV pending)

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Los Angeles, CA 90017

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Dated: May 4, 2023

PERKINS COIE LLP

/s/ Julie E. Schwartz

Julie E. Schwartz (PHV)

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CERTIFICATE OF SERVICE

I certify that on May 4, 2023, I served the foregoing Motion for Substitution of Counsel upon *Pro Se* Plaintiff, Daniel E. Hall, and counsel of record via the Court's electronic filing system.

/s/ Demetrio Aspiras

Demetrio F. Aspiras, III., Esq.